

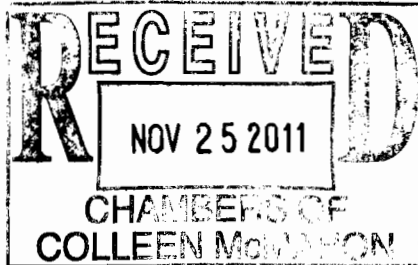
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November 23, 2011

BY FACSIMILE TO (212) 805-6326

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 14C
New York, New York 10007

11/28/2011
OK - 1st, but need
only request for
an additional week
Cm

Re: Development Specialists, Inc. ("DSI") v. Dechert LLP,
No. 11-cv-05984 (CM) and Twelve Other Actions Listed on Appendix A

Dear Judge McMahon:

MEMO ENDORSED

We represent Dechert LLP ("Dechert"). The Court's order dated November 2, 2011 (the "Order") provided that Dechert and the other law firm defendants listed on Appendix A (collectively, the "Law Firm Defendants") should move for summary judgment on or before December 1, 2011.

For the sake of efficiency, the Law Firm Defendants plan to file joint papers in support of their motions for summary judgment, and request an additional week to file due to the time needed to coordinate their joint papers, particularly given the Thanksgiving holiday. In addition, one of the Law Firm Defendants' counsel has been unavailable the past few weeks recovering from back surgery. We have conferred with counsel for plaintiff Development Specialists, Inc. ("DSI"), David Adler. He agreed, and asked for additional time for his opposition brief as well due to the upcoming December holidays. The Law Firm Defendants will thereafter need to coordinate their joint replies. For all these reasons, the parties respectfully request the Court's approval of the following proposed briefing schedule: (1) the Law Firm Defendants will file their joint motion papers on or before December 9, 2011; (2) DSI will file its opposition to the motions on or before January 9, 2012; and (3) the Law Firm Defendants will file their joint reply papers on or before January 25, 2012.

This is the parties' first request for an extension of time with respect to the Law Firm Defendants' upcoming summary judgment motions.

Respectfully submitted,

Claire L. Huene

MILLER & WRUBEL P. C.

Hon. Colleen McMahon

November 23, 2011

Page 2

cc: David J. Adler, Esq. (by e-mail)
Counsel for all Law Firm Defendants (by e-mail)

Appendix A

Law Firm Defendant	Case (in numerical order)
Jones Day	<i>Development Specialists v. Jones Day et ano</i> , No. 1:11-cv-05968
Duane Morris LLP	<i>Development Specialists v. Duane Morris LLP</i> , No. 1:11-cv-05969
Jones Day	<i>Development Specialists v. Jones Day et ano</i> , No. 1:11-cv-05970
Sheppard Mullin Richter & Hampton LLP	<i>Development Specialists v. Sheppard Mullin Richter & Hampton LLP</i> , No. 1:11-cv-05971
Jones Day	<i>Development Specialists v. Jones Day et ano</i> , No. 1:11-cv-05972
Arent Fox LLP	<i>Development Specialists v. Arent Fox LLP</i> , No. 1:11-cv-05973
Jones Day	<i>Development Specialists v. Jones Day</i> , No. 1:11-cv-05974
DLA Piper (US) LLP	<i>Development Specialists v. DLA Piper (US) LLP</i> , No. 1:11-cv-05983
Dechert LLP	<i>Development Specialists v. Dechert LLP</i> , No. 1:11-cv-05984
Morrison & Foerster LLP	<i>Development Specialists v. Morrison & Foerster LLP</i> , No. 1:11-cv-05985
K&L Gates LLP	<i>Development Specialists v. K&L Gates LLP</i> , No. 1:11-cv-05993
Akin Gump Strauss Hauer & Feld LLP	<i>Development Specialists v. Akin Gump Strauss Hauer & Feld LLP</i> , No. 1:11-cv-05994
Dorsey & Whitney LLP	<i>Development Specialists v. Dorsey & Whitney LLP</i> , No. 1:11-cv-05995